

**REMARKS**

Claims 1 through 10, 12 through 20 and 82 through 84 are pending in the present application and are presented for consideration upon entry of the instant amendment, which is respectfully requested.

The Office Action objected to the drawings as failing to comply with 37 CFR 1.84(p)(5). Figure 9 has been corrected so that it now complies with 37 CFR 1.84(p)(5). A replacement drawing sheet is provided herein pursuant to 37 CFR 1.121(d). Thus, the objection to the drawings is rendered moot.

Claims 1, 2, 6, 7, 8, 9, 12, 13, 15, 16, 18, 19 and 20 stand rejected under 35 U.S.C. §102(b) as being anticipated by UK Patent No. GB 2221925A to Barber.

Independent claim 1 now provides a controller for use with a fabric grooming device having an interactive user interface with one or more input selectors, one or more output indicators, and a digital display panel for displaying scrolled and segmented text. The interface is operatively connected to a microprocessor, and the interface is integrated onto the handle of the fabric grooming device.

Barber discloses an iron having a controller that indicates when the iron has reached its maximum temperature limit and should be returned to its base unit. The iron has a temperature selector knob and an LCD temperature display screen mounted

on the body of the iron. The display screen shows the thermal status and the selected temperature of the iron. The screen also provides visual warnings to return the iron back to the base unit when a certain temperature limit is reached. A microprocessor is used to control the temperature of the iron.

Present claim 1 differs from Barber in that claim 1 provides a digital display panel for displaying scrolled and segmented text. Additionally, claim 1 provides an interface integrated onto the handle of the fabric grooming device. In contrast, Barber discloses an LCD temperature display screen mounted on the body of an iron that simply provides the thermal status of the iron by either flashing the temperature or a light.

Thus, Barber clearly does not anticipate present claim 1. Applicants respectfully request that the rejection brought under 35 U.S.C. §102(b) be reconsidered and withdrawn with respect to claim 1.

Claims 2, 6, 7, 8, 9, 12, 13, 15 and 16 depend from the aforementioned claim 1. Thus, they are believed to be in condition for allowance. Therefore, Applicants respectfully request that the rejection under 35 U.S.C. §102(b) be reconsidered and withdrawn with respect to claims 2, 6, 7, 8, 9, 12, 13, 15 and 16.

Independent claim 18 now provides a controller for a fabric grooming device having a digital interface with a segmented LCD display for displaying segmented text and a scrolling LCD display suitable for displaying scrolling text. The controller has a

microprocessor operatively connected with the interface. The interface and the microprocessor are operatively connected to any of a variety of operational features of the fabric grooming device to facilitate interactive operational control thereof. The interface is integrated onto the handle of the fabric grooming device.

Independent claim 19 now provides a controller operatively associated with a fabric grooming device. The controller has a digital interface with a segmented LCD display suitable for displaying segmented text and a scrolling LCD display suitable for displaying scrolling text. The interface provides interactive communication between a user and the fabric grooming device. The interface is operatively connected with a microprocessor and one or more sensors. The interface is integrated onto the handle of the fabric grooming device.

Independent claim 20 now provides a user interface associated with a control for a fabric grooming device having one or more input selectors for inputting user instruction, one or more output indicators for outputting operational information, a microprocessor operatively connected to the input selectors and the output selectors, a segmented LCD display panel suitable for displaying segmented text, and a scrolling LCD display panel suitable for displaying scrolling text. The interface is integrated onto the handle of the fabric grooming device.

Barber has been described above. Barber does not anticipate present claims 18 through 20 because it fails to disclose a controller having a digital interface with a

segmented LCD display suitable for displaying segmented text and a scrolling LCD display suitable for displaying scrolling text. Furthermore, Barber fails to disclose a controller having an interface that is integrated onto the handle of the fabric grooming device. Thus, Applicants respectfully request that the rejection under 35 U.S.C. §102(b) be reconsidered and withdrawn with respect to claims 18 through 20.

Claims 14 and 17 stand rejected under 35 U.S.C. §103(a) as unpatentable over Barber (UK Patent No. GB2221925A) in view of Riess et al. (U.S. Patent No. 6,509,555).

Dependent claim 14 provides that one or more of the output indicators are a tactile indicator. Dependent claim 17 provides that the microprocessor is operatively connected to a vibrator.

Barber has been described above. Riess discloses at column 23, lines 52 – 58, a tactile signaling device that alerts a user when a bond has been formed. Riess is cited in the Office Action for teaching a hand held heater comprising a microprocessor operatively connected to a tactile feedback solenoid to alert the user of a successful operation of the device, thereby improving the user interface of the device to ensure system notification to the user. The Office Action submits that Riess further teaches the tactile output being a motor vibration or a solenoid actuation. See Office Action at page 8, paragraph 8. The Office Action submits that it would have been obvious to modify the microprocessor and output indicator of Barber with the microprocessor and control of

the tactile output/vibration of Riess to alert the user of a successful operation of the device.

However, Applicants respectfully submit that claims 14 and 17 are not rendered obvious by the combination of Barber and Riess. A tactile indicator such as the one disclosed in Riess, when combined with the Barber device, would make the Barber device more cumbersome, more expensive, and inconvenient because the output indicator of Barber is simply an LCD temperature display that is mounted onto the side of an iron. Thus, it would be impractical to integrate a tactile signaling device into an LCD display screen. Further, even if the tactile indicator was integrated into the display, it would be inefficient in providing notification to the user since the user does not grip the body of the iron where the display screen is mounted. Thus, a user of the Barber device would not be able to feel any vibrations of a tactile indicator, thereby defeating its intended purpose.

As noted in the Office Action, Barber does not disclose the application of one or more output indicators being a tactile indicator (as recited in claim 14) or of the microprocessor being operatively connected to a vibrator (as recited in claim 17); and the additional teaching of Riess (above) does not address this deficiency. It would not have been obvious to a person of ordinary skill in the art, nor would there have been motivation to combine the teachings of these two references to create the present invention as recited in claims 14 and 17. Thus, claims 14 and 17 are not rendered obvious over Barber in view of Riess. Applicants therefore respectfully request that the rejection under 35 U.S.C. §103(a) to claims 14 and 17 be reconsidered and withdrawn.

Claims 3 through 5, 10 and 82 through 84 stand rejected under 35 U.S.C. §103(a) as unpatentable over Barber (UK Patent No. GB2221925A) in view of Wellcome (UK Patent Application No. GB2163574A) as evidenced by Upadhye et al. (U.S. Publication No. 2003/0074903).

Dependent claims 3 and 82 through 84 of the present invention provide that at least one of the one or more input selectors is a touch-sensitive panel. In the claimed present invention, the input selector itself is in the form of an LCD touch-sensitive panel, as defined in the specification (See page 5, lines 17 – 18). The LCD touch-sensitive panel is suitable for displaying segmented text (See page 9, lines 18 – 22) or scrolling text (See page 12, lines 5 – 10).

Barber has been described above. Wellcome provides a control box that accommodates electronic components for controlling the working components of an iron. The box is provided with a user-operable control and a display panel for controlling the operation of the iron. The control box, or user interface, is not integrated onto the iron as it is in the present invention. Instead, it is interposed at any suitable location along an electrical lead. The control box may be arranged to stand on, or clip onto an ironing board. Alternatively, the box may stand on a table-top or on the floor.

The motivation for combining the teachings of Barber and Wellcome is submitted as removing movable mechanical actuating parts from the device and replacing them

with digital components, thereby increasing the operational longevity of the device. However, Applicants respectfully submit that claims 3 and 82 through 84 are not rendered obvious by the combination of the Barber and Wellcome references. Wellcome does not disclose the application of an LCD touch-sensitive panel that is an input selector as it is in the present invention. Furthermore, a touch-sensitive panel such as the one disclosed in Wellcome, when combined with the Barber device, would make the Barber reference more cumbersome, more expensive and potentially inoperable because the buttons disclosed in Wellcome have no place to fit into the control panel of the Barber device. One of ordinary skill in the art would not make such a modification, nor would there have been motivation to combine the teachings of these two references to create the present invention as recited in claims 3 and 82 through 84. Thus, claims 3 and 82 through 84 are not rendered obvious over Barber in view of Wellcome. Applicants therefore respectfully request that the rejection under 35 U.S.C. §103(a) to claims 3 and 82 through 84 be reconsidered and withdrawn.

Dependent claims 4 and 5 of the present invention provide that at least one of said one or more input selectors is an LCD panel and that at least one or said one or more input selectors is an LED panel. Dependent claim 10 of the present invention provides that at least one of said one or more output indicators is an LED panel.

Barber and Wellcome have been described above. Upadhye is cited in the Office Action for teaching an input device comprising input selectors being displayed in an LCD depending on the temperature selection. See Office Action at page 9,



paragraph 9. The motivation for combining the teachings of Barber, Wellcome and Upadhye is cited as providing the user with a lower power consumption device and a higher resolution in the device allowing for a smaller but comfortable display, thereby providing a quality product interaction experience.

However, Applicants respectfully submit that claims 4, 5 and 10 are not rendered obvious by the combination of the Barber, Wellcome and Upadhye references. Upadhye does not disclose the application of an LCD touch-panel that is an input selector as it is in the present invention. Furthermore, an LCD panel such as the one disclosed in Upadhye, when combined with the Barber-Wellcome device, would make the device more cumbersome, more expensive and potentially inoperable because the LCD disclosed in Upadhye has no place to fit into the control panel of the Wellcome device. As noted in the Office Action, Wellcome does not disclose the application of at least one of said one or more input selectors as an LCD panel and the additional teaching of Upadhye (above) does not address this deficiency. It would not have been obvious to a person of ordinary skill in the art, nor would there have been motivation to combine the teachings of these references to create the present invention as recited in claims 4, 5 and 10. Applicants therefore respectfully request that the rejection under 35 U.S.C. §103(a) to claims 4, 5 and 10 be reconsidered and withdrawn.

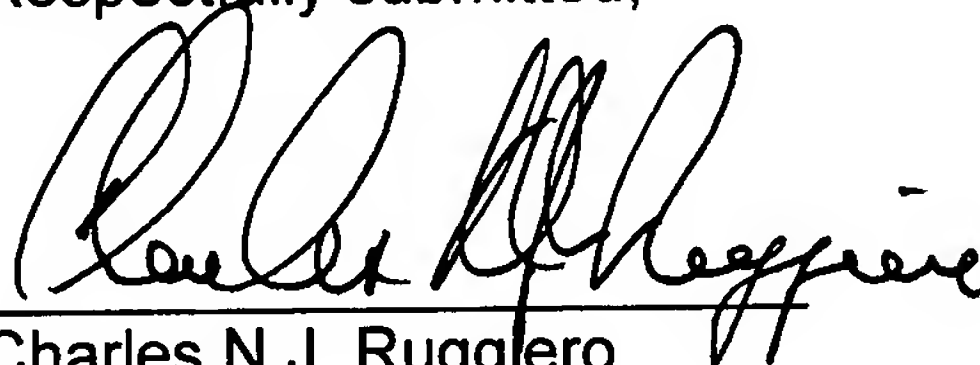
In view of the above, it is respectfully submitted that the present application is in condition for allowance. Such action is solicited.



In the alternative, it is believed that the instant amendment places the present application in better condition for appeal. Accordingly, entry and consideration of the instant amendment, at least for the purposes of appeal, are respectfully requested.

If for any reason the Examiner feels that consultation with Applicants' attorney would be helpful in the advancement of the prosecution, the Examiner is invited to call the telephone number below.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Charles N.J. Ruggiero", written over a horizontal line.

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Charles N.J. Ruggiero  
Reg. No. 28,468  
Attorneys for Applicants  
Ohlandt, Greeley, Ruggiero & Perle, LLP  
One Landmark Square, 10<sup>th</sup> Floor  
Stamford, CT 06901-2682  
Tel: (203) 327-4500  
Fax: (203) 327-6401